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UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION

<b>IN RE</b>  Michael Kingsley Ingram Lauren Christine Ingram   <b>DEBTORS</b>	<b>CHAPTER 13</b> <b>CASE NO. ND14-11232-PC</b>  <b>TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN; DECLARATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION</b>  <b>DATE/TIME: September 25, 2014 10:00 am</b> <b>Courtroom 201</b> <b>1415 State Street</b> <b>Santa Barbara, CA 93101-3101</b>
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The Trustee objects to confirmation of the plan because all requirements for confirmation as set forth in Title 11 of the United States Code and the Rules have not been met.

The Trustee requests, should all requirements not be met, that confirmation of the plan be denied, the case be dismissed or converted to Chapter 7 and for such other relief as the Court may deem appropriate.

**THE FAILURE OF THE DEBTORS (OR THE ATTORNEY FOR THE DEBTORS) TO APPEAR AT THE CONFIRMATION HEARING, OR TO FULLY COMPLY WITH ALL REQUIREMENTS FOR PLAN CONFIRMATION, MAY RESULT IN DISMISSAL OR CONVERSION OF THE CASE.**

DATED: August 25, 2014

/s/ Elizabeth Rojas

**I, Elizabeth Rojas, declare as follows:**

1. I am the Trustee in this matter, Michael Kingsley & Lauren Christine Ingram, ND14-11232-PC, and I have personal knowledge of files and records kept by my office in the regular course of business. I have personally reviewed the files and records kept by my office in the within case. The following facts are true and correct and within my own personal knowledge and I could and would testify competently thereto if called upon to do so.
2. I object to confirmation of the proposed plan because of the deficiencies set forth in the attached which is incorporated herein by reference. These deficiencies existed prior to or at the time of the 11 USC §341(a) meeting in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Sherman Oaks, California on August 25, 2014.

/s/ Elizabeth Rojas

I oppose plan confirmation because the **Debtors have failed to:**

- schedule debts within the limits of 11 USC §109(e); and therefore **ineligible**; and/or Debtors are not eligible to be Chapter 13 Debtors as follows:
  - **Potentially exceeds unsecured debt limit, must list approximate claim amts. for Sch.F, cannot be "unknown"**
  - **Amend to disclose amounts of all debt**
- disclose** [11 USC §521, LBR 1017-1(b)]
  - assets
  - creditors
  - income
  - prior case
  - **fmv of real property > scheduled**
  - **\$486,000 vs. \$345,000 scheduled (\$102,120 non-exempt equity after \$84,794 exemption) - provide evidence FMV**
- serve all** creditors with notice and the Plan at least 28 days before the 11 USC §341 (a) Meeting of Creditors, FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);
- provide the Trustee **documentation of all income** (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521;
  - **2012 tax return**
  - **2013 tax return**
  - **short form business report**
  - **2013 year-to-date income/expense**
  - **2014 year-to-date income/expense**
  - **6 months bank statements**
  - **decl of contribution w/evid income & where lives**
- meet the **business reporting requirements** regarding Debtors' business or self-employment, LBR 3015-1(c)(4);
  - **short form business report**
  - **2013 year-to-date income/expense**
  - **2014 year-to-date income/expense**
  - **6 months bank statements**
- provide to the Trustee completed copies of the Federal and State **income tax returns**, 11 USC § § 1308 and 521, LBR 3015-1(c)(3).
  - **2012 tax return**
  - **2013 tax return**
- propose a plan that is feasible 11 USC § 1325(a)(6); the plan is **infeasible** because
  - certain claims are not included and/or the amount provided is insufficient
    - income is not sufficient enough to fund it
      - **Deficit Budget**
    - plan payment will not retire debt within term
      - **Deficit Budget**
    - the plan does not propose treatment and/or properly treat all scheduled, priority and/or secured creditors; and/or plan deficiencies as follows:
      - **Plan is not feasible: Deficit budget**
- propose a plan that represents the Debtors' **best effort** 11 USC §1322; 11 USC §1325

- unreasonable and/or unnecessary expenses are scheduled
- the budget surplus exceeds the monthly plan payment
- comply with the Means Test as required by the Code, In re Kagenveama, 541 F3d 868, and/or In re Lanning, 1330 S.Ct.2464

propose a plan that provides creditors as much as would be received under **Chapter 7** 11 USC §1325(a)(4).  
- ch7 would receive > %  
- \$1,700 bank accts, \$5,768 Metlife Insurance, \$750 Ford F -350, \$3,363 GMC Yukon, \$9,350 Land Cruiser, \$6,500 Camaro, \$950 Chevelle, \$3,800 Chevelle not exempt

other issues as stated below:  
- Trustee to request interlineations that all tax returns be submitted to the Trustee; all tax refunds to be submitted into the plan and the Debtors will not incur debt greater than \$500 without Court permission.

## PROOF OF SERVICE

**In Re: Michael Kingsley & Lauren Christine Ingram  
Case No. ND14-11232-PC**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Elizabeth Rojas  
15060 Ventura Blvd.  
Suite 240  
Sherman Oaks, CA 91403

The foregoing document described as **TRUSTEE'S OBJECTION TO CONFIRMATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION** will be served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

On August 25, 2014, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Michael Kingsley Ingram  
Lauren Christine Ingram  
1226 Drake Drive  
Simi Valley, CA 93065

Russ W Ercolani  
Ercolani Law Group  
4195 E Thousand Oaks Bl Ste 175  
Westlake Village, CA 91362

Hon. Robin Riblet  
1415 State Street, Courtroom #201  
Santa Barbara, CA 93101-2511

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: August 25, 2014

/s/ Patricia Trujillo